

ZAVALA LAW GROUP, P.C.

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Attorney for Defendant, HONOR THE EARTH

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

RONEN HELMANN, on behalf of all
others similarly situated, and,

Plaintiffs,

vs.

CODEPINK WOMEN FOR PEACE, a
California entity, CODEPINK ACTION
FUND, a California entity, HONOR THE
EARTH, a Minnesota entity, COURTNEY
LENNA SCHIRF, and REMO IBRAHIM,
d/b/a PALESTINIAN YOUTH
MOVEMENT, and JOHN AND JANE
DOES 1-20,

Defendants.

CASE NO. 2:24-CV-05704-SVW-
PVC

*Assigned for all purposes to:
Honorable Stephen V. Wilson*

**DEFENDANT HONOR THE
EARTH'S NOTICE OF MOTION
AND MOTION TO STRIKE AND
DISMISS PLAINTIFFS' SECOND
AMENDED CLASS ACTION
COMPLAINT**

Hearing Date: February 10, 2025
Time: 1:30 p.m.
Dept.: Courtroom 10A

**SAC Filed: December 19, 2024
Trial Date: Not Set**

TO ALL PARTIES AND THEIR ATTORNEY OF RECORD:

This motion is made following the conference of counsel pursuant to L.R. 7-3 which, took place on January 3, 2025. PLEASE TAKE NOTICE that on February 10, 2025, these matters will be heard, at the First Street Courthouse,

1 located at 350 W. 1st Street, Courtroom 10A, 10th Floor, Los Angeles, California
2 90012 at 1:30 p.m. Attorney for Defendant Honor the Earth (hereinafter “HTE”)
3 will move the Court to strike and to dismiss the Second Amended Complaint
4 (“SAC”) of Plaintiff, Ronen Helmann, on behalf of all others similarly situated,
5 and (hereinafter “Plaintiffs”) naming HTE as a Defendant.

6 The Motion to Strike is based upon Federal Rules of Civil Procedure, Rule
7 12(f), as the language which HTE seeks to strike is both scandalous and speculative,
8 and is thus proper and appropriate to be stricken from the SAC. The Motion to
9 Dismiss is based on Federal Rule of Civil Procedure 12(b)(6) and 12(b)(2), on the
10 basis that the SAC fails to state a claim against HTE and the Court lacks personal
11 jurisdiction over HTE.

12 This Notice of Motion is based on the Motion to Strike and Dismiss Plaintiffs’
13 Second Amended Complaint and the Memorandum of Points and Authorities, along
14 with all papers and filings in this matter, all matters of which this Court takes judicial
15 notice, all Reply Memorandum of Points and Authorities, and upon such oral
16 argument as may be presented at the hearing.

17 Dated: January 9, 2025

Respectfully Submitted,

18 **ZAVALA LAW GROUP, P.C.**

19
20 /s/ N. Joe Innumerable

N. JOE INUMERABLE, ESQ.

Attorney for Defendant

HONOR THE EARTH

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is:

ZAVALA LAW GROUP, P.C.

811 W. 7th Street, Suite 1200
Los Angeles, CA 90017

On January 9, 2025, I served the foregoing document described as **DEFENDANT HONOR THE EARTH'S NOTICE OF MOTION AND MOTION TO STRIKE AND DISMISS PLAINTIFFS' SECOND AMENDED CLASS ACTION COMPLAINT** on the interested parties in this action via CM/ECF system following the Central District of California Local Rules for service upon the parties listed below:

Mark L. Javitch
Javitch Law Office
East 3rd Ave. Ste. 200
San Mateo, CA 94401
Email: mark@javitchlawoffice.com
Attorney for Plaintiffs

Dated: January 9, 2025

Lauren Stiles

Lauren Stiles